

MS6

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

**BEST & LEONARD  
COSTUME DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
Larry Dean THOMAS Jr.,  
Defendant.

Case No.: *dr*

COMPLAINT FOR VIOLATIONS OF  
Title 18, U.S.C. §1591(a) and (b)-  
Sex Trafficking of a Minor and by  
Force, Fraud and Coercion

'12 B

'12113944

The undersigned complainant being duly sworn states:

On or about October 24<sup>th</sup>, 2012 within the Southern District of California, defendant Larry Dean THOMAS Jr. knowingly, in and affecting interstate commerce, did recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, to wit: Minor Female (MF), knowing and in reckless disregard of the fact that MF: (1) would be caused to engage in a commercial sex act; and (2) having had a reasonable opportunity to observe MF and knowing and in reckless disregard of the fact that MF had not attained the age of 18 years; in violation of Title 18, United States Code, Sections 1591(a) and (b).

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Marc Jose  
Special Deputy U.S. Marshal

Sworn to before me and subscribed in my presence, this 25 day of October 2012.

U.S. MAGISTRATE JUDGE

MS

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2                   **PROBABLE CAUSE STATEMENT**  
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4                   On November 22<sup>nd</sup>, 2011, MF ran away from her home in Virginia. Her mother reported  
5 her missing to the Virginia Beach Police Department. MF went to San Diego in March of 2012  
6 to live with her grandmother. In June of 2012 MF ran away from her grandmother's home. Her  
7 grandmother did not report MF missing however she was still reported as a missing juvenile out  
8 of Virginia. MF began working for a pimp until he began physically beating her. In October of  
9 2012, MF wanted to leave this pimp. MF began texting Larry Dean Thomas Jr. on the social  
10 website "DateHookUp". Shortly after, Thomas and MF met each other in person in San Diego.  
11 Thomas told MF she was now working for him. Thomas bought MF clothes and provided her  
12 with a house to stay at in San Diego where he introduced her to another prostitute named Patricia  
13 White. White took photographs of MF and used the photographs to post ads of her on the  
14 internet website Backpage.com. The ads were listed in the adult/escort section of the website.  
15 Thomas gave MF several instructions on how to work as a prostitute. Thomas told her not to  
16 date or talk to other black men and to always use condoms. Thomas also instructed her to have  
17 the dates send a photograph of themselves so he could screen them first. Approximately two  
18 weeks ago MF was on her period. Thomas instructed her to stuff medical gauze pads in her  
19 vagina to stop the bleeding so she could keep working. Several days after working in this  
20 condition MF began to have vaginal pain. Thomas brought her to Kaiser Hospital for help  
21 however when the nurses began to ask questions about her age and wanted to notify her parents  
22 of her condition Thomas took her from the hospital and continued to have her work for him.

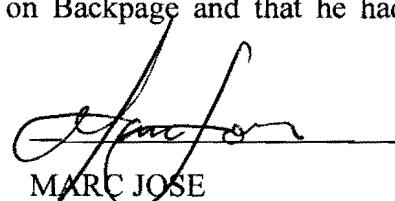
23                   On October 16<sup>th</sup>, 2012 MF's uncle reported to San Diego Police that he had discovered  
24 the escort ads of MF on Backpage and that she had run away from her grandmother's house. On  
25 October 24<sup>th</sup>, 2012, San Diego Police Detective V. Bales received this information. He  
26 contacted the grandmother of MF who confirmed that MF had run away again and her cell  
27 phone. Detective Bales checked Backpage and found an ad, #11776975, for MF which listed the  
28 same phone number. I was informed of this case and San Diego Police Detective E. Drilling  
29 called the ad and arranged to have MF meet him at room #37 of the Main Street Hotel located at

MJC

1 3494 Main Street in San Diego, for a date. Other detectives and I set up around the area of the  
2 Main Street Hotel for surveillance. At approximately 1750 hours a black Dodge Charger  
3 dropped off a female near the hotel at Thor Street and 3500 Dalbergia and then left the area. I  
4 saw that the driver of the black Charger was a black male with dreadlocks.

5 The female who exited the black Charger walked to room #37 and met with Detective  
6 Drilling. After Detective Drilling obtained a verbal agreement for a sexual act for money she  
7 was arrested for prostitution and was identified as MF. In her possession was a cell phone.  
8 Detective Drilling looked in the message log of the cell phone and determined there were several  
9 messages indicative to pimping and prostitution between MF and a contact listed as "Kim".  
10 Detective Drilling used the cell phone to portray himself as MF by sending a text message to  
11 Kim saying the date wanted anal sex. Kim replied by giving the instruction to charge him \$300  
12 for the anal sex. After approximately 20 minutes, Detective Drilling sent another message to Kim  
13 saying the date was done. MF told Detective Drilling that she was instructed by Thomas that he  
14 would pick her up at the same place he dropped her off at. At approximately 1845 hours the  
15 black Dodge Charger returned and parked on 3500 Dalbergia where patrol officers stopped him.  
16 I saw that the driver of the Dodge Charger was the same black male with dreadlocks that  
17 dropped off MF earlier. The driver was arrested and identified as Larry Dean Thomas Jr. In  
18 Thomas' pants pocket was the California driver's license and Social Security card for MF.

19 Thomas was transported to San Diego Police Headquarters. Detective Bales admonished  
20 Thomas who stated that he knew MF was working as prostitute and he drove her to her dates and  
21 was her protection. Thomas said that just before he dropped MF off at the hotel she gave him  
22 her ID cards and told him she was 17 years old. Thomas said that he would get paid 50% of the  
23 money MF made as a prostitute for driving her to dates. Thomas also admitted to getting a  
24 prepaid credit card that was used to post ads of MF on Backpage and that he had sent the  
25 message to charge \$300 for anal sex to MF's cell phone.



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27 MARC JOSE  
28 Special Deputy U.S. Marshal  
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